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JOHNSON CONTROLS INC. and  
JOHNSON CONTROLS SECURITY SOLUTIONS LLC

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affect PG&E Corporation  
☐ Affects Pacific Gas and Electric Corporation  
☒ Affects both Debtors

BK Case No.: 19-30088-DM (Lead Case)  
19-30089-DM

Chapter 11

**JOHNSON CONTROLS INC.'S AND  
JOHNSON CONTROLS SECURITY  
SOLUTIONS LLC'S OBJECTION TO  
PLAN AND CURE AMOUNT**



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CASE NO. 19-30088-DM

- 1 -

JOHNSON CONTROLS INC.'S AND JOHNSON CONTROLS SECURITY SOLUTIONS LLC'S OBJECTION TO

PLAN AND CURE AMOUNT

Case: 19-30088 Doc#: 7234 Filed: 05/15/20 Entered: 05/15/20 12:29:55 Page 1 of 22

Creditors JOHNSON CONTROLS, INC. and JOHNSON CONTROLS SECURITY SOLUTIONS LLC (also known as Tyco Integrated Security, LLC) (collectively, “Johnson Controls”), by and through the undersigned counsel, hereby files this Objection to Plan and Cure Amount (“Objection”). In support of this Objection, Johnson Controls represents the following:

**Contracts Proposed for Assumption**

1. On May 1, 2020, the Debtor filed its Schedule of Executory Contracts and Unexpired Leases to be Assumed Pursuant to the Plan and Proposed Cure Amounts (“Assumption Schedule”). The Assumption Schedule lists the following contracts to be assumed with Johnson Controls on pages 890 and 1694 of docket entry 7037:

Non-Debtor Counter Party	Match ID	Contract ID	Title of Agreement	Effective Date of Agreement	Cure Amount
Johnson Controls, Government Systems, LLC	1016334	SRCDAL_01768	Contract (Long Form) – Utility Energy Services Contract	6/28/2018	-
Johnson Controls, Inc.	1007752	CCNRD_02989	UESC – Vendor MSA		-
Tyco Electronics Corporation	1007752	CCNGSA_00918	Natural Gas Service Agreement	9/1/2014	-
Tyco Integrated Security LLC	1007752	SRCPOS_2700021614	Purchase Order #2700021614 Dated 10/24/2017	10/24/2017	\$463,887.04

2. Johnson Controls does not object the cure amount listed for the Contract (Long Form) – Utility Energy Services Contract, dated June 28, 2018 because its records reflect that no amounts are due from the Debtor. Similarly, it does object to the cure amount listed for the UESC – Vendor MSA because that contract is the same contract as the Contract (Long Form) – Utility Energy Services Contract.

3. Johnson Controls has no record of the Natural Gas Service Agreement, and the Debtors have been unable to produce a copy of this agreement. Accordingly, to the extent the Debtor seeks to bind Johnson Controls under the Natural Gas Service Agreement, it should not be assumed.

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**Objection to Cure Amount**

4. Johnson Controls does, however, object to the stated cure amount for the Purchase Order #2700021614 Dated 10/24/2017 (the “PO”) for the following reasons:

A. The Assumption Schedule refers to just one purchase order that was issued under the Master Services Agreement, dated July 7, 2017, PG&E Contract No. 4400011710, as amended by Change Order No. 1 dated (collectively, the “Master Services Agreement”).

B. The PO referenced in the Assumption Schedule represents just one of many projects and related billings under the Master Services Agreement.

C. Johnson Controls’ internal records reflect that the cure amount for pre-petition and post-petition goods and services under the Master Services Agreement is \$4,572,766.93, as of May 15, 2020.

D. Furthermore, Johnson Controls continues to provide goods and services under the Master Services Agreement post-petition. As a result, the amounts due and owing will necessarily continue to increase.

5. The Master Services Agreement is too voluminous to file on the docket. Instead, Johnson Controls has attached copies of the signed cover pages with identifying information as **Exhibit A**. Johnson Controls has provided a complete copy of the Master Services Agreement to the Debtors’ professionals, and they have agreed that the Master Services Agreement will be assumed.

6. A schedule of amounts due and owing under the Master Services Agreement is attached as **Exhibit B**.

7. **Exhibit B** contains three parts, which represent (a) prepetition amounts due; (b) post-petition amounts that have been invoiced but not paid; and (c) amounts for goods and services provided post-petition for which no invoices have been issued.

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1           8.       The name and contact information for the person authorized to resolve this  
2 objection are as follows:

3  
4                   Carla O. Andres, Esq.  
5                   **Godfrey & Kahn, S.C.**  
6                   Attorney for Johnson Controls, Inc.  
7                   100 West Lawrence Street  
8                   Appleton, WI 54911-5754  
9                   Telephone: (920) 831-6362  
10                  Facsimile: (920) 830-3530  
11                  Email: candres@gklaw.com

12               WHEREFORE, Johnson Controls, Inc. requests that the Court deny confirmation pending  
13 a resolution of Johnson Controls, Inc.'s objection to the cure amount.

14               Dated: May 15, 2020

**MEYER LAW GROUP LLP**

15                               By: /s/ BRENT D. MEYER

16                               Brent D. Meyer  
17                               Attorneys for Creditors  
18                               JOHNSON CONTROLS INC. and  
19                               JOHNSON CONTROLS SECURITY  
20                               SOLUTIONS LLC

# **Exhibit A**

## **Master Services Agreement**

**Contract (Long Form)**

This is a Contract between the below named Contractor ("Contractor"), a Florida corporation, and Pacific Gas and Electric Company ("PG&E"), a California corporation with its headquarters located at 77 Beale Street, San Francisco, California 94105.

Contractor's Legal Name:	TYCO INTEGRATED SECURITY LLC	PG&E Contract No. 4400011710
Contractor's Address:	3801 BAY CENTER PLACE HAYWARD, CA 94545	This Contract consists of 137 pages.

**Project Name:**

**Job Location:** PG&E Territory as requested

**WORK:** Contractor shall, at its own risk and expense, perform the Work described in this Contract and furnish all labor, equipment, and materials necessary to complete the Work as summarized below and as more fully described in Attachment 1, Scope of Work. This is not an exclusive Contract. This Contract does not guarantee Contractor any Work nor is there any guarantee as to any volume or duration of Work.

- Contractor shall The Contractor shall furnish and install, including but not limited to Security Access Control Systems, Alarm systems, wired and wireless closed Circuit Televisions Systems (CCTV), Perimeter Detection systems, Intrusion Detection systems, thermal radar and deployable trailers, microwave detection, Card Access Systems, Identification Devices, and diagnostic Devices.

**ATTACHMENTS:** Each of the following documents is attached to this Contract and incorporated herein by this reference:

Attachment 1: Specific Conditions, 25 pages with Exhibits, 100 pages;

Attachment 2: Amended General Conditions 06132017, 35 pages

**CONTRACT TERM:** This Contract is effective upon signature by both parties and expires on **June 30, 2018**.

**COMPLETION:** Contractor shall commence performance hereof when directed to do so by PG&E. Work shall be completed by the completion date of **June 30, 2018**. Time is of the essence.

**INSURANCE:** Contractor shall maintain insurance in accordance with Section 9 of the Amended General Conditions.

**TERMS OF PAYMENT:** In accordance with Section 13.1 of the Amended General Conditions.

**CONSIDERATION:** As full consideration for satisfactory performance of the Work by Contractor, PG&E's total obligation to Contractor shall not exceed the following amount. This amount is inclusive of all taxes incurred in the performance of the Work. Any change to this amount shall only be authorized in writing by a PG&E Contract Change Order, fully executed by both PG&E and Contractor.

**TOTAL:** THE SUM OF ALL EXECUTED CONTRACT WORK AUTHORIZATIONS.

**THE PARTIES, BY SIGNATURE OF THEIR AUTHORIZED REPRESENTATIVES, HEREBY AGREE TO THE TERMS OF THIS CONTRACT.**

PACIFIC GAS AND ELECTRIC COMPANY		CONTRACTOR: Tyco Integrated Security	
Signature	e-Signed by David Kevane on 2017-07-07 15:04:32 GMT	Signature	Digitally signed by Bobby Louissaint DN: C=US, E=blouissaint@tyco.com, O=Tyco IS, OU=Director National/Strategic Accounts, CN=Bobby Louissaint Reason: I am approving this document Date: 2017.07.07 07:32:32-07'00'
Name		Name	Bobby Louissaint
Title	Director, Sourcing	Title	Bobby Louissaint Regional Director
Date		Date	



ADMINISTRATION			
<b>PG&amp;E Negotiator</b>	Brendan A. Kearney	<b>Contractor Representative</b>	Bobby Louissaint
<b>Phone</b>	415-973-1329	<b>Phone</b>	310-941-2088
<b>Email</b>	BAK8@pge.com	<b>Email</b>	blouissaint@tyco.com
<b>Accounting Reference</b>	Specific to each BPO and Post Order		
<b>PG&amp;E Work Supervisor:</b>	<b>Brian Walker, Manager Corporate Security Department</b>	<b>Phone: 925-324-9305 mobile</b>	
<b>INVOICE INSTRUCTIONS:</b> Contractor shall send invoices for each payment when due, showing the Contract number, to: PACIFIC GAS AND ELECTRIC COMPANY	<b>Send ORIGINAL Invoice to:</b>	PG&E Accounts Payable* PO Box 7760 San Francisco, CA 94120-7760	
	<b>Send COPY of Invoice to:</b>	Work Supervisor as requested on CWAs	
	For information regarding invoice status, call PG&E's Paid Help Line at (800) 756-PAID (7243) or go to AP Web Reporting site at <a href="http://www.pge.com/actpay">www.pge.com/actpay</a> . <b>*Note:</b> Contractors using the XIGN System do not need to mail a copy of the invoice to PG&E.		

INTERNAL PG&E USE ONLY		
<b>Distribution Date</b>		
<b>Distribution of Copies</b>	<input type="checkbox"/> Document Services (Signed Original Copy) Mail Code N5D 245 MARKET ST., SAN FRANCISCO	<input type="checkbox"/> Contractor (Signed Original Copy)
	<input type="checkbox"/> Work Supervisor	<input type="checkbox"/> Manager
	<input type="checkbox"/> Invoice Approver	<input type="checkbox"/> Supervisor
	<input type="checkbox"/> V.P.	<input type="checkbox"/> Sourcing/ Purchasing
	<input type="checkbox"/> Director	<input type="checkbox"/> Law: Pending 3/120/17





## Contract Change Order

This is Change Order ("CO") No. 1 to Contract No. 4400011710 dated 07/07/2017 between the below-named Contractor ("Contractor"), a Florida corporation, and Pacific Gas and Electric Company ("PG&E"), a California corporation with its headquarters located at 77 Beale Street, San Francisco, California 94105. Contractor shall perform all Work under this Contract, as amended by this Change Order, pursuant to and in accordance with the terms and conditions of the Contract.

**Contractor's Legal Name:** TYCO INTEGRATED SECURITY LLC

This Contract Change Order consists of 4 page(s).

**Contractor's Address:** 3801 BAY CENTER PLACE  
HAYWARD, CA 94545

**Project Name:**

**Job Location:** PG&E Territory as requested

**CHANGES:** The Parties hereby modify the Contract referenced above as follows:

All other terms and conditions of the MSA remain the same.

Please refer to page 3.

**ATTACHMENTS:** The following are attached to this Contract Change Order and incorporated herein by this reference.

None

<b>PRICING CHANGES:</b>	Previous Total Contract Value:	\$ The Sum of all Duly Authorized Contract Work Authorizations
	Addition or Deduction:	\$ The Sum of all Duly Authorized Contract Work Authorizations
	Revised Total Contract Value:	\$ The Sum of all Duly Authorized Contract Work Authorizations



All other terms and conditions of the Contract, as it may have been amended by previous Contract Change Order(s), if any, shall remain the same.

Change Order No. 1  
Contract No. 4400011710

Page 2 of 4

THE PARTIES, BY SIGNATURE OF THEIR AUTHORIZED REPRESENTATIVES, HEREBY AGREE TO THE TERMS OF THIS CONTRACT CHANGE ORDER.

PACIFIC GAS AND ELECTRIC COMPANY		CONTRACTOR: TYCO INTEGRATED SECURITY LLC.	
Signature	 DocuSigned by: 86ECAFFA69E04B6...	Signature	 DocuSigned by: 68C0E917F487467...
Name	Steven S. Coleman	Name	Neal Vanskiver
Title	Sr. Director, Electric T&D Sourcing	Title	Sr. Director, Sourcing
Date	4/24/2018	Date	4/24/2018

ADMINISTRATION			
PG&E Negotiator	Brendan Kearney	Contractor Representative	Bobby Louissaint
Phone	415-973-1329	Phone	310-941*-2088
Email:	Bak8@pge.com	Email:	blouissaint@tyco.com
Accounting Reference	As specified in each applicable CWA		

INTERNAL PG&E USE ONLY		
Distribution Date		
Distribution of Copies	<input type="checkbox"/> Document Services (Signed Original Copy) Mail Code N5D 245 MARKET ST., SAN FRANCISCO	<input checked="" type="checkbox"/> Contractor (Signed Original Copy)
	<input type="checkbox"/> Work Supervisor	<input type="checkbox"/> Manager
	<input type="checkbox"/> Invoice Approver	<input type="checkbox"/> Supervisor
	<input type="checkbox"/> V.P.	<input type="checkbox"/> Sourcing/ Purchasing
	<input type="checkbox"/> Director	<input type="checkbox"/> Law

# **Exhibit B**

## **Cure Amounts**

Prepetition Amounts Due			
PO Number:	Invoice #	Total	Job Description
2501511319	29945885	\$ 1,621.92	Installation
2501511319	29945887	\$ 1,598.76	Installation
2501511319	29945888	\$ 694.30	Installation
2501511319	29945889	\$ 1,158.11	Installation
2501511319	29945890	\$ 1,158.11	Installation
2501511319	29945893	\$ 1,849.20	Installation
2501511319	29945894	\$ 1,148.85	Installation
2501511319	29945895	\$ 1,158.11	Installation
2501511319	29945896	\$ 1,371.49	Installation
2501511319	29945897	\$ 1,722.82	Installation
2501511319	29945898	\$ 2,285.62	Installation
2501511319	29945899	\$ 1,162.74	Installation
2501511319	29945900	\$ 1,589.51	Installation
2501511319	29945901	\$ 1,144.21	Installation
2501511319	29945902	\$ 2,503.65	Installation
2501511319	29945903	\$ 2,299.52	Installation
2501511319	29945904	\$ 1,366.86	Installation
2501511319	29945905	\$ 2,726.29	Installation
2501511319	29945906	\$ 2,058.35	Installation
2501511319	29945907	\$ 1,148.85	Installation
2501511319	29945909	\$ 1,148.85	Installation
2501511319	29945910	\$ 1,380.76	Installation
2501511319	29945911	\$ 1,635.81	Installation
2501511319	29945912	\$ 1,621.92	Installation
2501511319	29945914	\$ 1,162.74	Installation
2501511319	29945915	\$ 1,385.38	Installation
2501511319	29945916	\$ 1,366.86	Installation
2501511319	29945918	\$ 1,390.02	Installation
2501511319	29945919	\$ 1,144.21	Installation
2501511319	29945920	\$ 1,148.85	Installation
2501511319	29945921	\$ 1,153.47	Installation
2501511319	29945922	\$ 1,158.11	Installation
2501511319	29945923	\$ 694.30	Installation
2501511319	29945924	\$ 1,148.85	Installation
2501511319	29945925	\$ 1,158.11	Installation
2501511319	29945926	\$ 1,380.76	Installation
2501511319	29945927	\$ 1,635.81	Installation
2501511319	29945928	\$ 1,158.11	Installation
2501511319	29945929	\$ 916.94	Installation
2501511319	29945930	\$ 1,390.02	Installation
2501511319	29945932	\$ 1,162.74	Installation
2501511319	29945936	\$ 1,153.47	Installation
2501511319	29945937	\$ 2,168.12	Installation
2501511319	29945938	\$ 1,376.12	Installation
2501511319	29945939	\$ 1,390.02	Installation

2501511319	29945940	\$ 1,385.38	Installation
2501511319	29945941	\$ 2,062.97	Installation
2501511319	29945944	\$ 1,148.85	Installation
2501511319	29947303	\$ 1,371.49	Installation
2501511319	29947317	\$ 1,945.47	Installation
2501511319	29947333	\$ 680.41	Installation
2501511319	29947336	\$ 1,153.47	Installation
2501511319	29947339	\$ 1,589.51	Installation
2501511319	29947340	\$ 1,148.85	Installation
2501511319	29947344	\$ 685.03	Installation
2501511319	30073734	\$ 1,162.74	Installation
2501511319	31031425	\$ 1,385.38	Installation
2501511319	31369189	\$ 1,167.37	Installation
2501511319	31369196	\$ 1,380.76	Installation
2501511319	31369206	\$ 2,285.62	Installation
2501511319	31369222	\$ 1,394.64	Installation
2501511319	31369226	\$ 1,171.99	Installation
2501511319	31512439	\$ 880.00	Installation
2501511319	31512440	\$ 880.00	Installation
2501511319	31513699	\$ 1,100.00	Installation
2501511319	31672130	\$ 9,779.49	Installation
2501519321	29945917	\$ 854.04	Installation
2501519321	29945933	\$ 854.04	Installation
2501519321	31512415	\$ 649.92	Installation
2501519321	31512416	\$ 649.92	Installation
2501519321	31512418	\$ 893.71	Installation
2501519321	31512419	\$ 649.92	Installation
2501526040	29945879	\$ 1,024.41	Installation
2501526040	30086635	\$ 824.75	Pro-Rated Service
2501526040	30086636	\$ 635.73	Pro-Rated Service
2501526040	30086638	\$ 6,583.92	Installation
2501526040	30086639	\$ 18,240.04	Installation
2501590218	30086634	\$ 849.05	Pro-Rated Service
2501607059	31116500	\$ 162.25	Recurring Service
2501607059	31595769	\$ 162.25	Recurring Service
2501617044	30416754	\$ 130.00	Pro-Rated Service
2501617044	30734393	\$ 360.00	Recurring Service
2501618058	30398989	\$ 90.23	Pro-Rated Service
2501618058	31116501	\$ 100.25	Recurring Service
2501618058	31595770	\$ 100.25	Recurring Service
2700004710	29773837	\$ 2,068.20	Pro-Rated Service
2700004710	30953336	\$ 2,326.75	Recurring Service
2700005957	30403503	\$ 2,234.86	Installation
2700021614	30871109	\$ 272.94	Installation
2700021614	31369186	\$ 19,623.20	Installation
2700021614	31369190	\$ 17,829.38	Installation
2700021614	31369193	\$ 17,251.38	Installation

2700021614	31369199	\$ 16,827.05	Installation
2700021614	31369213	\$ 19,887.34	Installation
2700021614	31369218	\$ 19,464.83	Installation
2700021614	31369225	\$ 21,326.13	Installation
2700021614	31509549	\$ 17,698.26	Installation
2700021614	31512423	\$ 19,221.95	Installation
2700021614	31512428	\$ 20,010.40	Installation
2700021614	31512436	\$ 19,702.75	Installation
2700021614	31512449	\$ 16,637.46	Installation
2700021614	31512455	\$ 16,324.98	Installation
2700021614	31512459	\$ 16,273.14	Installation
2700021614	31512464	\$ 16,583.41	Installation
2700021614	31512468	\$ 15,920.98	Installation
2700021614	31512476	\$ 18,193.70	Installation
2700021614	31512481	\$ 17,586.49	Installation
2700021614	31672127	\$ 19,764.27	Installation
2700021614	31672132	\$ 19,641.22	Installation
2700021614	31677871	\$ 18,443.95	Installation
2700021614	31677874	\$ 22,707.58	Installation
2700021614	31677879	\$ 18,443.96	Installation
2700021614	31677886	\$ 20,079.27	Installation
2700116437	31036916	\$ 2,827.15	Installation
2700133910	31029504	\$ 3,677.72	Installation
2700141010	31031424	\$ 19,054.18	Installation
2700141010	31369187	\$ 28,244.67	Installation
2700141010	31369188	\$ 8,890.52	Installation
2700141010	31369194	\$ 28,129.18	Installation
2700141010	31369195	\$ 8,872.93	Installation
2700141010	31369200	\$ 28,206.17	Installation
2700141010	31369201	\$ 8,884.66	Installation
2700141010	31369204	\$ 28,206.17	Installation
2700141010	31369205	\$ 9,709.66	Installation
2700141010	31369210	\$ 28,174.07	Installation
2700141010	31369211	\$ 8,884.66	Installation
2700141010	31369215	\$ 28,228.89	Installation
2700141010	31369216	\$ 8,893.46	Installation
2700141010	31369220	\$ 28,206.17	Installation
2700141010	31369221	\$ 8,884.66	Installation
2700141010	31369223	\$ 28,206.17	Installation
2700141010	31369224	\$ 8,884.66	Installation
2700141010	31369231	\$ 28,177.30	Installation
2700141010	31369232	\$ 9,667.76	Installation
2700141010	31512412	\$ 20,783.17	Installation
2700141010	31512424	\$ 28,137.51	Installation
2700141010	31512425	\$ 19,653.80	Installation
2700141010	31512429	\$ 28,283.17	Installation
2700141010	31512430	\$ 9,821.39	Installation

2700141010	31512437	\$ 20,735.04	Installation
2700141010	31512438	\$ 19,751.56	Installation
2700141010	31512444	\$ 20,577.15	Installation
2700141010	31512445	\$ 19,793.46	Installation
2700141010	31512450	\$ 20,742.74	Installation
2700141010	31512451	\$ 19,108.35	Installation
2700141010	31512460	\$ 20,685.00	Installation
2700141010	31512461	\$ 8,881.44	Installation
2700141010	31512466	\$ 9,737.59	Installation
2700141010	31512477	\$ 20,728.89	Installation
2700141010	31512482	\$ 20,667.67	Installation
2700141010	31512483	\$ 19,653.80	Installation
2700141010	31672121	\$ 8,013.15	Installation
2700141010	3.2E+07	\$ 8,013.15	Installation
2700141010	31672123	\$ 11,059.61	Installation
2700141010	31672124	\$ 8,013.15	Installation
2700141010	31672128	\$ 28,210.62	Installation
2700141010	31672129	\$ 9,765.52	Installation
2700141010	31672133	\$ 20,858.17	Installation
2700141010	31672134	\$ 19,100.09	Installation
2700141010	31677875	\$ 20,173.77	Installation
2700141010	31677876	\$ 8,622.12	Installation
2700141010	31677880	\$ 12,683.40	Installation
2700141010	31677881	\$ 8,026.71	Installation
2700141010	31677882	\$ 28,167.67	Installation
2700141010	31677883	\$ 19,653.80	Installation
2700141010	31679742	\$ 20,241.14	Installation
2700141010	1512413A	\$ 9,188.39	Installation
2700141010	1512465A	\$ 20,250.67	Installation
2700174157	31029502	\$ 160,656.66	Installation
2700190611	31672136	\$ 1,779.57	Installation
2700190612	31672135	\$ 168,725.29	Installation
2700190618	31672131	\$ 84,931.11	Installation
2700190992	31672126	\$ 91,367.45	Installation
2700201685	30717841	\$ 1,295,661.09	Installation
2700202053	31491641	\$ 114,134.19	Installation
2700202058	31746178	\$ 74,564.00	Installation
2700215196	29945883	\$ 854.04	Installation
2700215196	29945891	\$ 854.04	Installation
2700215196	29945892	\$ 854.04	Installation
2700215196	29945908	\$ 893.71	Installation
2700215196	29945913	\$ 854.04	Installation
2700215196	29945934	\$ 1,032.59	Installation
2700215196	29945935	\$ 854.04	Installation
2700215196	29947324	\$ 854.04	Installation
2700215196	29947329	\$ 854.04	Installation
2700215196	29947334	\$ 854.04	Installation

2700215196	29947335	\$ 854.04	Installation
2700215196	29947337	\$ 854.04	Installation
2700215196	31512414	\$ 1,760.00	Installation
2700215196	31512420	\$ 974.88	Installation
2700215196	31512431	\$ 649.92	Installation
2700215196	3.2E+07	\$ 649.92	Installation
2700215196	31512433	\$ 812.40	Installation
2700215196	31512441	\$ 649.92	Installation
2700215196	31512446	\$ 649.92	Installation
2700215196	31512452	\$ 649.92	Installation
2700215196	31512456	\$ 649.92	Installation
2700215196	31512467	\$ 812.40	Installation
2700215196	31512469	\$ 812.40	Installation
2700215196	31512470	\$ 649.92	Installation
2700215196	31512471	\$ 649.92	Installation
2700215196	31512472	\$ 812.40	Installation
2700215196	31512473	\$ 649.92	Installation
2700222859	30093697	\$ 3,340.04	Time and Material Service
2700222859	30427486	\$ 1,493.76	Time and Material Service
2700222859	30563790	\$ 901.53	Time and Material Service
2700222859	30563791	\$ 7,533.15	Time and Material Service
2700222859	30563792	\$ 7,063.07	Time and Material Service
2700222859	30563793	\$ 5,446.39	Time and Material Service
2700222859	31223697	\$ 1,612.03	Time and Material Service
2700222862	29931679	\$ 490.72	Time and Material Service
2700222862	29951819	\$ 624.84	Time and Material Service
2700222862	30080923	\$ 5,699.48	Time and Material Service
2700222862	30262026	\$ 772.12	Time and Material Service
2700222862	30412871	\$ 1,452.50	Time and Material Service
2700222862	30424982	\$ 480.70	Time and Material Service
2700222862	30717842	\$ 230.00	Time and Material Service
2700222862	30725131	\$ 460.00	Time and Material Service
2700222862	30725132	\$ 230.00	Time and Material Service
2700222862	30729340	\$ 258.75	Time and Material Service
2700222862	30729341	\$ 230.00	Time and Material Service
2700222862	30731364	\$ 230.00	Time and Material Service
2700222862	30732766	\$ 115.00	Time and Material Service
2700222862	30732767	\$ 230.00	Time and Material Service
2700222862	30738468	\$ 488.75	Time and Material Service
2700222862	30738469	\$ 872.85	Time and Material Service
2700222862	30738470	\$ 517.35	Time and Material Service
2700222862	30743325	\$ 932.10	Time and Material Service
2700222862	30743326	\$ 287.50	Time and Material Service
2700222862	30743327	\$ 258.75	Time and Material Service
2700222862	30863924	\$ 373.75	Time and Material Service
2700222862	30864975	\$ 402.50	Time and Material Service
2700222862	30866302	\$ 345.00	Time and Material Service



2700222862	30868500	\$ 431.25	Time and Material Service
2700222862	30869803	\$ 546.25	Time and Material Service
2700222862	30869804	\$ 287.50	Time and Material Service
2700222862	30872538	\$ 402.50	Time and Material Service
2700222862	30876341	\$ 747.50	Time and Material Service
2700222862	30880417	\$ 316.25	Time and Material Service
2700222862	30882164	\$ 373.75	Time and Material Service
2700222862	30896624	\$ 776.25	Time and Material Service
2700222862	30900248	\$ 1,437.50	Time and Material Service
2700222862	30900249	\$ 287.50	Time and Material Service
2700222862	30902666	\$ 632.50	Time and Material Service
2700222862	30902667	\$ 431.25	Time and Material Service
2700222862	30903827	\$ 230.00	Time and Material Service
2700222862	30903828	\$ 143.75	Time and Material Service
2700222862	30905072	\$ 603.75	Time and Material Service
2700222862	30905073	\$ 1,150.00	Time and Material Service
2700222862	30905074	\$ 230.00	Time and Material Service
2700222862	30905075	\$ 345.00	Time and Material Service
2700222862	30905076	\$ 258.75	Time and Material Service
2700222862	30905077	\$ 230.00	Time and Material Service
2700222862	30906407	\$ 1,351.25	Time and Material Service
2700222862	30906408	\$ 891.25	Time and Material Service
2700222862	31016200	\$ 316.25	Time and Material Service
2700222862	31019789	\$ 402.50	Time and Material Service
2700222862	31021056	\$ 575.00	Time and Material Service
2700222862	31021057	\$ 230.00	Time and Material Service
2700222862	31022423	\$ 345.00	Time and Material Service
2700222862	31023710	\$ 402.50	Time and Material Service
2700222862	31023711	\$ 316.25	Time and Material Service
2700222862	31023712	\$ 230.00	Time and Material Service
2700222862	31025041	\$ 115.00	Time and Material Service
2700222862	31026347	\$ 230.00	Time and Material Service
2700222862	31029505	\$ 632.50	Time and Material Service
2700222862	31031440	\$ 402.50	Time and Material Service
2700222862	31031441	\$ 546.25	Time and Material Service
2700222862	31031442	\$ 143.75	Time and Material Service
2700222862	31033862	\$ 230.00	Time and Material Service
2700222862	31033863	\$ 230.00	Time and Material Service
2700222862	31036917	\$ 345.00	Time and Material Service
2700222862	31192119	\$ 575.00	Time and Material Service
2700222862	31192120	\$ 2,185.00	Time and Material Service
2700222862	31192121	\$ 373.75	Time and Material Service
2700222862	31194474	\$ 402.50	Time and Material Service
2700222862	31197869	\$ 402.50	Time and Material Service
2700222862	31199449	\$ 230.00	Time and Material Service
2700222862	31199450	\$ 115.00	Time and Material Service
2700222862	31199451	\$ 431.25	Time and Material Service

2700222862	31200926	\$ 287.50	Time and Material Service
2700222862	31206335	\$ 460.00	Time and Material Service
2700222862	31211992	\$ 258.75	Time and Material Service
2700222862	31214227	\$ 603.75	Time and Material Service
2700222862	31218724	\$ 287.50	Time and Material Service
2700222862	31223693	\$ 431.25	Time and Material Service
2700222862	31223694	\$ 488.75	Time and Material Service
2700222862	31223695	\$ 661.25	Time and Material Service
2700222862	31223696	\$ 287.50	Time and Material Service
2700222862	31223698	\$ 115.00	Time and Material Service
2700222862	31225988	\$ 316.25	Time and Material Service
2700222862	31227273	\$ 230.00	Time and Material Service
2700222862	31227274	\$ 603.75	Time and Material Service
2700222862	31227275	\$ 258.75	Time and Material Service
2700222862	31228355	\$ 690.00	Time and Material Service
2700222862	31345420	\$ 460.00	Time and Material Service
2700222862	31346506	\$ 460.00	Time and Material Service
2700222862	31346507	\$ 1,150.00	Time and Material Service
2700222862	31347802	\$ 402.50	Time and Material Service
2700222862	31347803	\$ 517.50	Time and Material Service
2700222862	31347804	\$ 230.00	Time and Material Service
2700222862	31347805	\$ 517.50	Time and Material Service
2700222862	31350082	\$ 1,178.75	Time and Material Service
2700222862	31350083	\$ 345.00	Time and Material Service
2700222862	31353473	\$ 460.00	Time and Material Service
2700222862	31354992	\$ 230.00	Time and Material Service
2700222862	31357546	\$ 316.25	Time and Material Service
2700222862	31359397	\$ 943.01	Time and Material Service
2700222862	31360983	\$ 230.00	Time and Material Service
2700222862	31363936	\$ 316.25	Time and Material Service
2700222862	31363937	\$ 230.00	Time and Material Service
2700222862	31363938	\$ 230.00	Time and Material Service
2700222862	31367072	\$ 316.25	Time and Material Service
2700222862	31369233	\$ 373.75	Time and Material Service
2700222862	31372311	\$ 287.50	Time and Material Service
2700222862	31375375	\$ 431.25	Time and Material Service
2700222862	31375376	\$ 230.00	Time and Material Service
2700222862	31488416	\$ 230.00	Time and Material Service
2700222862	31491643	\$ 345.00	Time and Material Service
2700222862	31496014	\$ 230.00	Time and Material Service
2700222862	31496015	\$ 575.00	Time and Material Service
2700222862	31499081	\$ 747.50	Time and Material Service
2700222862	31499082	\$ 517.50	Time and Material Service
2700222862	31501139	\$ 230.00	Time and Material Service
2700222862	31502944	\$ 546.25	Time and Material Service
2700222862	31504631	\$ 488.75	Time and Material Service
2700222862	31504632	\$ 632.50	Time and Material Service

2700222862	31504633	\$ 316.25	Time and Material Service
2700222862	31504634	\$ 115.00	Time and Material Service
2700222862	31504635	\$ 115.00	Time and Material Service
2700222862	31509550	\$ 287.50	Time and Material Service
2700222862	31511133	\$ 1,811.25	Time and Material Service
2700222862	31511134	\$ 258.75	Time and Material Service
2700222862	31511135	\$ 345.00	Time and Material Service
2700222862	31511136	\$ 517.50	Time and Material Service
2700222862	31512484	\$ 345.00	Time and Material Service
2700222862	31513700	\$ 230.00	Time and Material Service
2700222862	31514927	\$ 115.00	Time and Material Service
2700222862	31514928	\$ 258.75	Time and Material Service
2700222862	31514929	\$ 230.00	Time and Material Service
2700222862	31516379	\$ 690.00	Time and Material Service
2700222862	31517848	\$ 546.25	Time and Material Service
2700222862	31519304	\$ 648.19	Time and Material Service
2700222862	31520797	\$ 230.00	Time and Material Service
2700222862	31520798	\$ 230.00	Time and Material Service
2700222862	31522215	\$ 115.00	Time and Material Service
2700222862	31675210	\$ 460.00	Time and Material Service
2700222862	31679743	\$ 172.50	Time and Material Service
2700222862	31681687	\$ 431.25	Time and Material Service
2700222862	31747462	\$ 373.75	Time and Material Service
2700222862	31751418	\$ 230.00	Time and Material Service
2700222862	31751419	\$ 230.00	Time and Material Service
2700222862	31751420	\$ 230.00	Time and Material Service
2700222862	31873453	\$ 488.75	Time and Material Service
2700222862	31875064	\$ 424.69	Time and Material Service
2700222862	31876633	\$ 258.75	Time and Material Service
2700222862	31876634	\$ 172.50	Time and Material Service
2700222862	31876635	\$ 1,150.00	Time and Material Service
2700222862	31876636	\$ 345.00	Time and Material Service
2700222862	31876637	\$ 230.00	Time and Material Service
2700222862	31878145	\$ 517.50	Time and Material Service
2700222862	31881476	\$ 230.00	Time and Material Service
2700222862	31884677	\$ 488.75	Time and Material Service
2700242588	31218723	\$ 83,968.52	Installation
2700439950	31595771	\$ 10,040.25	Recurring Service
	30086637	\$ 84.79	Pro-Rated Service
	31512478	\$ 19,118.46	Installation
	10416961	\$ 1,726.00	Recurring Service
	10419691	\$ 2,326.75	Recurring Service
	10422331	\$ 794.82	Recurring Service
	31116502	\$ 10,040.25	Recurring Service
	31116503	\$ 1,953.25	Recurring Service
	31427187	\$ 2,326.75	Recurring Service
	31595772	\$ 609.08	Recurring Service

Multiple	10421076	\$ 11,162.23	Recurring Service
Multiple	10423284	\$ 2,326.75	Recurring Service
Multiple	10424980	\$ 12,436.00	Recurring Service
Not issued	31036915	\$ 3,049.30	Installation
Not provided	31681686	\$ 10,108.55	Installation
	<b>Total:</b>	<b>\$ 3,821,102.56</b>	

**Post-petition Amounts Invoiced and Unpaid**

PO Number:	Invoice #	Total	Job Description
	31886589	\$ 8,013.06	PROGRESS BILL INSTL
	31886592	\$ 8,013.06	PROGRESS BILL INSTL
	31886597	\$ 9,653.80	INSTALLATION CHARGE
	31886588	\$ 11,059.62	PROGRESS BILL INSTL
	31886590	\$ 11,059.62	PROGRESS BILL INSTL
	31886591	\$ 11,059.62	PROGRESS BILL INSTL
	31886596	\$ 28,167.67	INSTALLATION CHARGE
	31888552	\$ 11,059.62	PROGRESS BILL INSTL
	31888553	\$ 20,686.92	INSTALLATION CHARGE
	31888556	\$ 20,706.17	INSTALLATION CHARGE
	31888554	\$ 20,735.04	INSTALLATION CHARGE
4148733	31893738	\$ 230.00	T+M SERVICE
4151894	31895656	\$ 1,265.00	T+M SERVICE
	31947376	\$ 2,326.75	QUARTERLY BILLING
4196889	32268140	\$ 1,459.51	T+M SERVICE
	32270053	\$ 51,332.89	INSTALLATION CHARGE
	32211922	\$ 107.77	QUARTERLY BILLING
	32211921	\$ 162.25	QUARTERLY BILLING
	32081664	\$ 774.00	ANNUAL SVC
	32211923	\$ 10,040.25	QUARTERLY BILLING
20190322-3	32279779	\$ 1,778.16	T+M SERVICE
	32402542	\$ 10,486.00	INSTALLATION CHARGE
	32537860	\$ 9,000.00	PRO RATED SVC
20190404-38	32543194	\$ 2,156.25	T+M SERVICE
	32472690	\$ 2,326.75	QUARTERLY BILLING
	32701805	\$ 230.00	T+M SERVICE
NA	32703693	\$ 230.00	T+M SERVICE
20190404-38	32716257	\$ 3,113.29	T+M SERVICE
	32626651	\$ 107.77	QUARTERLY BILLING
	32626650	\$ 162.25	QUARTERLY BILLING
	32626652	\$ 10,040.25	QUARTERLY BILLING
	32730787	\$ 1,484.35	T+M SERVICE
20190404-39	32734541	\$ 1,006.25	T+M SERVICE
	32735194	\$ 2,277.93	T+M SERVICE
20190705-4	32857296	\$ 1,134.38	T+M SERVICE
	32878940	\$ 948.75	T+M SERVICE
20190705-6	32877069	\$ 1,703.74	T+M SERVICE
	32779754	\$ 17,500.00	MONTHLY BILLING
20190722-6	32989180	\$ 1,382.58	T+M SERVICE
	32472691	\$ 350.00	MONTHLY BILLING
PROJECT	32996464	\$ 575.00	T+M SERVICE
	32998112	\$ 977.50	T+M SERVICE
	32928156	\$ 2,326.75	QUARTERLY BILLING
	32928157	\$ 17,500.00	MONTHLY BILLING
	32266627	\$ 62,814.81	PRO RATED SVC

	33086782	\$ 115.85	QUARTERLY BILLING
	33086781	\$ 174.42	QUARTERLY BILLING
	33086783	\$ 10,793.27	QUARTERLY BILLING
	33086785	\$ 17,500.00	MONTHLY BILLING
	31886595	\$ 18,445.96	INSTALLATION CHARGE
	32026915	\$ 995.14	INSTALLATION CHARGE
	33247565	\$ 17,500.00	MONTHLY BILLING
	32779753	\$ 45,000.00	ANNUAL SVC
	32779753A	\$ 72,000.00	
	33385267	\$ 2,326.75	QUARTERLY BILLING
2700144193	33385268	\$ 17,500.00	MONTHLY BILLING
	33533421	\$ 107.77	QUARTERLY BILLING
	33533420	\$ 162.25	QUARTERLY BILLING
	33533423	\$ 1,953.25	QUARTERLY BILLING
	33533422	\$ 10,040.25	QUARTERLY BILLING
2700144193	33533424	\$ 17,500.00	MONTHLY BILLING
2700144193	33676615	\$ 17,500.00	MONTHLY BILLING
	33957912	\$ 107.77	QUARTERLY BILLING
	33957911	\$ 162.25	QUARTERLY BILLING
	33957910	\$ 832.05	ANNUAL SVC
	33957914	\$ 1,953.25	QUARTERLY BILLING
	33957913	\$ 10,040.25	QUARTERLY BILLING
2700144193	33957915	\$ 17,500.00	MONTHLY BILLING
	32419077	\$ 2,014.53	T+M SERVICE
2700144193	34114578	\$ 17,500.00	MONTHLY BILLING
	<b>Total:</b>	<b>\$ 679,250.39</b>	

Unpaid Post-petition Amounts to be Invoiced						
Billed	PO Number:	PGE Action Needed	Estimate #	Total	Customer #	Comments
Invoice not billed		PO Issued	1-3HWJW71	\$ 284,002.13	109139590	Pre Tax
Invoice not billed		PO Issued	1-3ee4sc2	\$ 416,538.59	145715178	Pre Tax
			<b>Total:</b>	<b>\$ 700,540.72</b>		